

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

JUNE E. ADAMS IRREVOCABLE TRUST Civil
Action No.: DATED 7/21/14 FBO EDWARD
ROBERT ADAMS, individually and on behalf of
all others CLASS ACTION similarly situated,

Plaintiff

Case Number

vs.

7:23-cv-00332

INTERNATIONAL BUSINESS MACHINES
CORPORATION, et al.

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

JUNE E. ADAMS IRREVOCABLE TRUST
DATED 7/21/14 FBO EDWARD ROBERT
ADAMS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff

Case Number

vs.

7:22-cv-02831

INTERNATIONAL BUSINESS MACHINES
CORPORATION, et al.

Defendant

Status of Earlier Filed Case:

☒

X

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

Voluntary Dismissal

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Open

(If so, set forth procedural status and summarize any court rulings.)

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The two actions plead many of the same facts, have five defendants in common, and bring claims pursuant to Section 10(b) of the Securities and Exchange Act of 1934. The class period of the instant matter falls within the class period as the prior Adams case. Plaintiff filed the prior Adams case as a related case to Hayden and the Court assigned it accordingly. Given the Court's familiarity with both the Hayden case and the prior Adams case, assigning the same Court promotes efficiency.

Signature: /s/ Jacob A. Goldberg Date: 01/23/2023

Firm: The Rosen Law Firm, P.A.